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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 EDITH WILLIAMS,)
13 Plaintiff,) Case No. 3:18-cv-00175-LRH-WGC
14 v.)
15 NANCY A. BERRYHILL,) **STIPULATION AND ORDER**
15 Acting Commissioner of Social Security,) **FOR EXTENSION OF TIME FOR**
16 Defendant.) **DEFENDANT TO FILE OPPOSITION TO**
16) **PLAINTIFF'S MOTION TO REMAND**

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of
19 record, that Defendant shall have an extension of time of 7 days to file her opposition to Plaintiff's
20 motion to remand, to be continued from September 28, 2018, to October 5, 2018.

21 This is the second continuance in this case sought by Defendant. There is good cause for this
22 request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule
23 with multiple deadlines on or around September 28, 2018, including new matters that were not
24 previously anticipated and could not be assigned to another attorney and have created some crowding of
25 the briefing schedule around the due date of this case. Because of the factors described above,

1 Defendant is requesting additional time up to and including October 5, 2018, to fully review the
2 administrative record and research the issues presented by Plaintiff's motion to remand. This request is
3 made in good faith with no intention to unduly delay the proceedings.

4 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 7 days,
5 so that Defendant may file her opposition to Plaintiff's motion to remand on or before October 5, 2018.

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7 Respectfully submitted,

8 Dated: September 27, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

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10 /s/ Cyrus Safa
11 (as authorized via e-mail on 9/27/2018)
12 CYRUS SAFA
13 Attorneys for Plaintiff

14 Dated: September 27, 2018

STEVEN W. MYHRE
15 Acting United States Attorney

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17 /s/ Carolyn B. Chen
18 CAROLYN B. CHEN
19 Special Assistant United States Attorney

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21 ORDER

22 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

23 DATED: September 28, 2018

24 William G. Cobb

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26 HON. WILLIAM G. COBB
UNITED STATE MAGISTRATE JUDGE